THE MARKS LAW FIRM, P.C.

April 9, 2025

FILED VIA ECF

Hon. Jennifer L. Rochon United States District Judge Southern District of New York 500 Pearl Street, Courtroom 20B New York, NY 10007

RE: Altaune Brown v. Master Barbers Barber Shop, Inc., et al.

Index: 1:25-cv-01045-JLR

Dear Judge Rochon,

Pursuant to Section I(F) of Your Honor's Individual Part Rules and Practices ("Requests for Adjournments or Extensions of Time"), Plaintiff respectfully requests a forty-five (45) day extension of the deadline to submit a joint letter informing the Court whether the parties have settled, or if the parties do not reach a settlement, a joint letter requesting that the Court refer the case to mediation or a magistrate judge for a settlement conference from **April 10, 2025** to **May 25, 2025**, in accordance with Your Honor's Orders dated February 7, 2025 and February 10, 2025 [Dkt. 6 and 7].

The reason for this request is that, on April 7, 2025, our office again contacted Robert Jaffe, the owner/member of Defendant, 1169 2nd Ave LLC ("1169"), who advised that he was speaking to Defendant, Master Barbers Barber Shop ("Master Barbers") regarding this matter and had not yet retained counsel. Mr. Jaffe also expressed an intent to resolve this matter expeditiously. It is our understanding, based on our call with Mr. Jaffe, that neither Master Barbers nor 1169 are currently represented by counsel; however, they are fully aware of this litigation and require additional time to retain counsel. It should be noted that Plaintiff has not spoken to Master Barbers, or its agents directly, nor have we heard from said Defendant.

In light of the above, Plaintiff respectfully requests a forty-five (45) day extension of the deadline to submit a joint letter, which would allow Plaintiff to continue exploring settlement with Defendants and afford additional time for Defendants to investigate the claims alleged in this matter, and appear in this action. If the parties are unable to resolve and if Defendants fail to appear in this action, then Plaintiff intends to move for default judgment no later than <u>May 25, 2025</u>, in accordance with Your Honor's Individual Rules and Practices. This is the first request of its kind to extend.

Thank you for your attention to the above. Please let us know if your Honor requires any additional information.

THE MARKS LAW FIRM, P.C.

Respectfully Submitted,

The Marks Law Firm, P.C.

The request for an extension to file the joint letter is GRANTED. The parties shall file a joint letter with the Court by May 25, 2025.

By:

Bradly G. Marks

Dated: April 10, 2025 New York, New York SO ORDERED.

VENNIEER L. ROCHON United States District Judge